

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) CRIMINAL NO. 05-30017-MAP  
 )  
 CARLOS MARRERO )

ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING

Defendant, Carlos Marrero, moves that the Court continue the sentencing hearing in this matter, presently scheduled for September 7, 2007, to September 21, 2001 or other date convenient to the Court.<sup>1</sup> As reasons therefore, counsel for defendant states that a draft Presentence Report has been issued and that there is no objection to the sentencing calculations included therein. Moreover, the parties by a binding plea agreement pursuant to Fed.R.Crim.P. 11(c)(1)(C) have stipulated to a binding sentence. Consequently, both parties are prepared for sentencing. Counsel for defendant, however, has been asked to appear as faculty at a national CJA training program in Baltimore, Maryland that is to take place on September 6-7, 2007. The sentencing hearing as presently scheduled would preclude counsel's appearance at that conference.

<sup>1</sup>Counsel's obligations in the Boston and Worcester divisions of the District Court make an appearance in Springfield the week of September 10 impractical.

Defendant therefore respectfully requests that the Court grant a brief continuance to accommodate counsel's schedule.

The government assents to this Motion.

CARLOS MARRERO  
By His Attorney,

/s/ Timothy G. Watkins  
Timothy G. Watkins  
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), as well as to U.S. Probation Officer Richard Rinaldi by electronic mail, on August 29, 2007.

/s/ Timothy G. Watkins  
Timothy G. Watkins